1 | Honorable John H. Chun 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 STEVEN GNASSI, NO. C20-6095 JHC Plaintiff, 10 STIPULATION AND ORDER **EXTENDING DISCOVERY** 11 **DEADLINE** CARLOS DEL TORO, Secretary of the 12 **NOTED:** June 21, 2022 Navy, 13 Defendant. 14 15 COME NOW the parties, and respectfully agree and request that the Court extend the 16 discovery deadline for the sole purpose of permitting Defendant Navy to depose two of 17 Plaintiff's disclosed experts: Dr. Paul K. Patterson and PA-C Greg W. Mennie. Discovery is 18 currently scheduled to conclude on June 27, 2022 (Order, Dkt. No.16). The parties request 19 that the deadline be extended to July 1, 2022. 20 As good grounds in support of the parties' stipulation, the parties state that despite 21 best efforts, a brief extension is needed to complete the two remaining depositions noticed in 22 this action. The brief extension is needed due to the sudden illness of counsel for the Navy 23 24 UNITED STATES ATTORNEY

1	who is handling these depositions, necessitating	g the rescheduling of these two depositions.
2	Scheduling conflicts of the witnesses and under	rsigned counsel prevent the two depositions
3	from being scheduled within the time remaining	g for discovery.
4	Accordingly, the parties respectfully req	uest this brief extension of the discovery
5	deadline to July 1, 2022 for the sole purpose of	permitting the Navy to take the depositions
6	of Dr. Patterson and PA-C Mennie.	
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8	DATED this 21st day of June, 2022.	
9	Respectfully submitted,	
10	By:	By:
11	MACDONALD HOAGUE & BAYLESS	NICHOLAS W. BROWN United States Attorney
12	/ I Hr	•
13	s/Jesse Wing JESSE WING, WSBA #27751	<u>s/Patricia D. Gugin</u> PATRICIA D. GUGIN, WSBA
14	MacDonald Hoague & Bayless 705 Second Avenue, Suite 1500	#43458 Assistant United States Attorney
15	Seattle, Washington 98104 Phone: 206-622-1604	United States Attorney's Office 1201 Pacific Avenue, Suite 700
16	Email: JesseW@MHB.com	Tacoma, Washington 98402 Phone: 253-428-3800
17	Attorney for Plaintiff	Fax: 253-428-3826 E-mail: pat.gugin@usdoj.gov
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19		Attorney for Defendant
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1	<u>ORDER</u>
2	Pursuant to the foregoing Stipulation, it is hereby
3	ORDERED, ADJUDGED and DECREED that good cause is shown for the requested
4	extensions, accordingly, the deadline for discovery is extended from June 27, 2022, to July 1,
5	2022 for the sole purpose of taking the depositions of Dr. Patterson and PA-C Mennie.
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7	DATED this 22nd day of June, 2022.
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10	John M. Chan
11	John H. Chun United States District Judge
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13	Dragantad by:
14	Presented by:
15	MACDONALD HOAGUE & BAYLESS
16	<u>s/ Jesse Wing</u> JESSE WING, WSBA #27751
17	MacDonald Hoague & Bayless
18	705 Second Avenue, Suite 1500 Seattle, Washington 98104
19	Phone: 206-622-1604 Email: JesseW@MHB.com
20	Attorney for Plaintiff
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3	NICHOLAS W. BROWN United States Attorney
4	s/ Patricia D. Gugin
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10	Attorney for Defendant
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24	STIPULATION AND ORDER EXTENDING